

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

AMERICA SCIENCE TEAM RICHMOND,
INC.,

*Plaintiff/Counterclaim
Defendant,*

v.

ENOCH CHAN,

*Defendant/Counterclaim
Plaintiff.*

Civil Action No. 3:22-cv-00451-JAG

**PLAINTIFF/COUNTERCLAIM DEFENDANT'S NOTICE IN REGARD TO
DEFENDANT/COUNTERCLAIM PLAINTIFF'S MOTION TO SUPPLEMENT**

Dated: May 2, 2025

Stephen M. Faraci, Sr., Esquire (VSB #42748)
Robert N. Drewry, Esquire (VSB #91282)
WHITEFORD, TAYLOR & PRESTON, LLP
1021 E. Cary Street, Suite 2001
Richmond, Virginia 23219
Telephone: (804) 977-3307
Facsimile: (804) 977-3298
E-Mail: sfaraci@whitefordlaw.com
E-Mail: rdrewry@whitefordlaw.com

*Counsel for Plaintiff/Counterclaim Defendant,
American Science Team Richmond, Inc.*

America Science Team Richmond, Inc. (“**AmeriSci**”), by counsel, pursuant to Local Civil Rule 7(F)(1), submits this Notice in Regard to Defendant/Counterclaim Plaintiff’s, Enoch Chan (“**Chan**”), Motion to Supplement (the “**Motion**”).

NOTICE

On April 24, 2025, Chan filed a Motion to Supplement the exhibit to Chan’s Answer and Counterclaim (D.N. 43), which provided a purported communication between Chan’s mother and Elaine Chang. *See* D.N. 43, Exhibit 1. Chan seeks to attach the purported translation to his Counterclaim, which is subject to a Motion to Dismiss filed by AmeriSci (D.N. 48). AmeriSci is not in a position to respond to either the authenticity or completeness of the proffered translation and seeks to reserve all rights to respond to same at an appropriate time, should a response be necessary following the Court’s ruling on AmeriSci’s Motion to Dismiss (D.N. 48).

Accordingly, AmeriSci neither consents to nor opposes the Motion and files this Notice to advise the Court of same. Instead, AmeriSci reserves its right to contest the authenticity of the document, the accuracy of the translation, and to provide appropriate context concerning the communication in question.

Dated: May 2, 2025

AMERICA SCIENCE TEAM RICHMOND, INC.

/s/ Robert N. Drewry

Stephen M. Faraci, Sr., Esquire (VSB #42748)

Robert N. Drewry, Esquire (VSB #91282)

WHITEFORD, TAYLOR & PRESTON, L.L.P.

1021 E. Cary Street, Suite 2001

Richmond, Virginia 23219

Telephone: (804) 977-3307

Facsimile: (804) 977-3298

E-Mail: sfaraci@whitefordlaw.com

E-Mail: rdrewry@whitefordlaw.com

*Counsel for Plaintiff/Counterclaim Defendant,
American Science Team Richmond, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 2, 2025, a copy of the foregoing *Plaintiff/Counterclaim Defendant's Notice in Regard to Defendant/Counterclaim Plaintiff's Motion To Supplement* was filed with the Court's CM/ECF system, which will then send the document and notification of such file (NEF) to all counsel of record.

/s/ Robert N. Drewry

Robert N. Drewry, Esquire (VSB #91282)
WHITEFORD, TAYLOR & PRESTON, LLP
1021 E. Cary Street, Suite 2001
Richmond, Virginia 23219
Telephone: (804) 977-3307
Facsimile: (804) 977-3298
E-Mail: rdrewry@whitefordlaw.com